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November 16, 2012

Hon. John Gleeson United States District Court Eastern District of New York 225 Cadman Plaza East, Room 727S Brooklyn, New York 11201

RE: Precision Associates, Inc. v. Panalpina World Transport (Holding) LTD., et. al., Case No.: 08-CV-00042 (JG) (VVP)

Dear Judge Gleeson,

With this letter Interim Class Counsel are submitting to Your Honor:

- 1. A Proposed Long Form Notice of Class Action Settlements;
- 2. A Proposed Publication Notice of Class Action Settlements; and
- 3. A Proposed Short Form Notice of Class Action Settlements and Claim Form.

The Court's order of October 10, 2012, ECF No. 666 ("Order"), requires Plaintiffs to make certain revisions to the proposed class notice program which Plaintiffs had previously submitted. All of those changes have been made. Some small additional changes have been made that are reflected in the redline version.

On October 12, 2012, the Court entered an Order on the ECF docket which provided that Plaintiffs file a clean version of the notice papers and a redline showing all edits made since the corrected papers filed on September 24, 2012 (ECF No. 656) and the initial papers filed on September 20, 2012 (ECF No. 654). The redlined document reflects all changes made from the September 20, 2012 filing until present. The October 12, 2012 Order also directed Plaintiffs to resolve ambiguity concerning the proposed interim distribution.

In the hopes of clarifying any ambiguity, Plaintiffs describe the present state of the Proposed Notice Plan as well as differences from the previously proposed plan as follows:

1. Plaintiffs propose an interim distribution, and information about the interim distribution, the proposed plan to pay class members, and the claim form has been included in the notices.

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- 2. The Proposed Claim Form is a new document which has not previously been provided to the Court.
- 3. Plaintiffs no longer propose a "Postcard Notice" because (a) the addition of information about the Morrison Express settlement makes it infeasible to provide sufficient information in a Postcard format, and (b) because Plaintiffs are including a proposed Claim Form to be sent with a Short Form Notice in place of the publication notice. This Short Form Notice is identical to the Publication Notice and will be a single document including the Claim Form.

Respectfully Submitted,

/s/ Steven N. Williams

Steven N. Williams

cc: All Counsel of Record (via ECF)
Magistrate Judge Viktor Pohorelsky (via ECF and hand delivery)